

APPENDIX B-2

ADDENDUM TO VISUAL IMPACT ANALYSIS

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Memo

Date: Thursday, July 05, 2018

Project: Daggett Solar Power Facility

To: Aarty Joshi, NRG Renewables

From: Clint Meyer, AICP

Subject: Administrative Draft Addendum to Visual Impact Analysis – Key Observation Point 6

HDR Engineering, Inc. (HDR) prepared a Visual Impact Assessment (VIA), dated June 29, 2018, for NRG Renewable's proposed Daggett Solar Power Facility (project). The VIA includes six Key Observation Points (KOPs), KOP 1 through 5B, to evaluate project-related changes to views at selected viewing locations within the local viewshed following construction of the project. Photographic simulations of the project were generated for each of the six KOP locations and are presented in the VIA.

At the request of San Bernardino County, a seventh KOP was identified for analysis based on comments received during the public scoping process. KOP 6 was selected to capture a representative vantage of the project area from the Historic Route 66 (US 66) corridor; also referred to as the National Trails Highway. Figure 1 illustrates the location of KOP 6 and the other KOPs identified in the VIA. As shown in Figure 1, the photo vantage for KOP 6 is oriented to the east-northeast and includes the Barstow-Daggett Airport.

This memo summarizes the analysis of KOP 6 following methods for evaluating visual changes to the landscape based on Bureau of Land Management (BLM) Manual H-8410-1, which involves rating the resource's visual qualities, measuring public concern, and determining the extent to which an area is visible from travel routes and other observation points. Additional detail of these methods are provided in the VIA, which includes a brief description of the California Historic Route 66 Corridor Management Plan: Needles to Barstow prepared by BLM in 2015.

KOP 6 – Existing Conditions

As described in Section 2 of the VIA, each KOP was selected to assess the visual change resulting from the project solar facilities. KOP 6 was selected to capture a representative view from a segment of US 66 south-southwest of the project site. This segment of US 66 is commonly referred to as the “whoop-di-dos” based on the ribbon of asphalt that follows the localized topography and provides views of the western Mojave Valley when traveling eastbound (see Figure 1). The vantage of the KOP is to the east-northeast to simulate a view when traveling east and looking from US 66 toward the southwestern portion of the project. The photograph was collected using a Canon EOS Rebel T6 fitted on a tripod at approximately 54 inches in height.

KOP 6 is located directly on US 66, approximately one mile west of Hidden Springs Road (approximately 34.84916667 latitude, 116.82333333 longitude) (Figure 1). This KOP depicts views of the western Mojave Valley floor along US 66 (Figure 2). A paved road (Sante Fe Street) and electrical distribution lines (and poles) are visible in the foreground, along with a double-tracked railroad, irrigated pasture, and rural residential structures. Bartow-Daggett Airport and scattered rural residential structures and windrows of trees are visible in the middleground. KOP 6 contains a portion of the Project site in the fore- and middleground. Existing physical encroachments include the roadways, overhead power lines (and poles),

rural residential structures, and a water storage tank at the Bartow-Daggett Airport. Mountains and ridgelines, including Solder Mountain, are visible in the distant background to the east.

The scenic attractiveness of KOP 6 is typical for the region and the landscape lacks a distinct form and topographical contrast in the fore and middle ground. This landscape view is common in the area, but retains a slightly distinctive background with topographical features to the east and a relative feeling of openness (see Figure 2). The scenic quality of KOP 6 is low to moderate (Class III) based on the presence of road infrastructure and overhead utility distribution lines. This classification is consistent with those identified for adjacent BLM lands, which are classified as Visual Resource Inventory (VRI) Classes III and IV (see VIA Appendix B). This KOP provides a typical view for drivers traveling eastbound along US 66. Considering the frequent viewing by local residents and visitors, viewers would have a moderate sensitivity to the visual changes in the area.

KOP 6 – Proposed Conditions

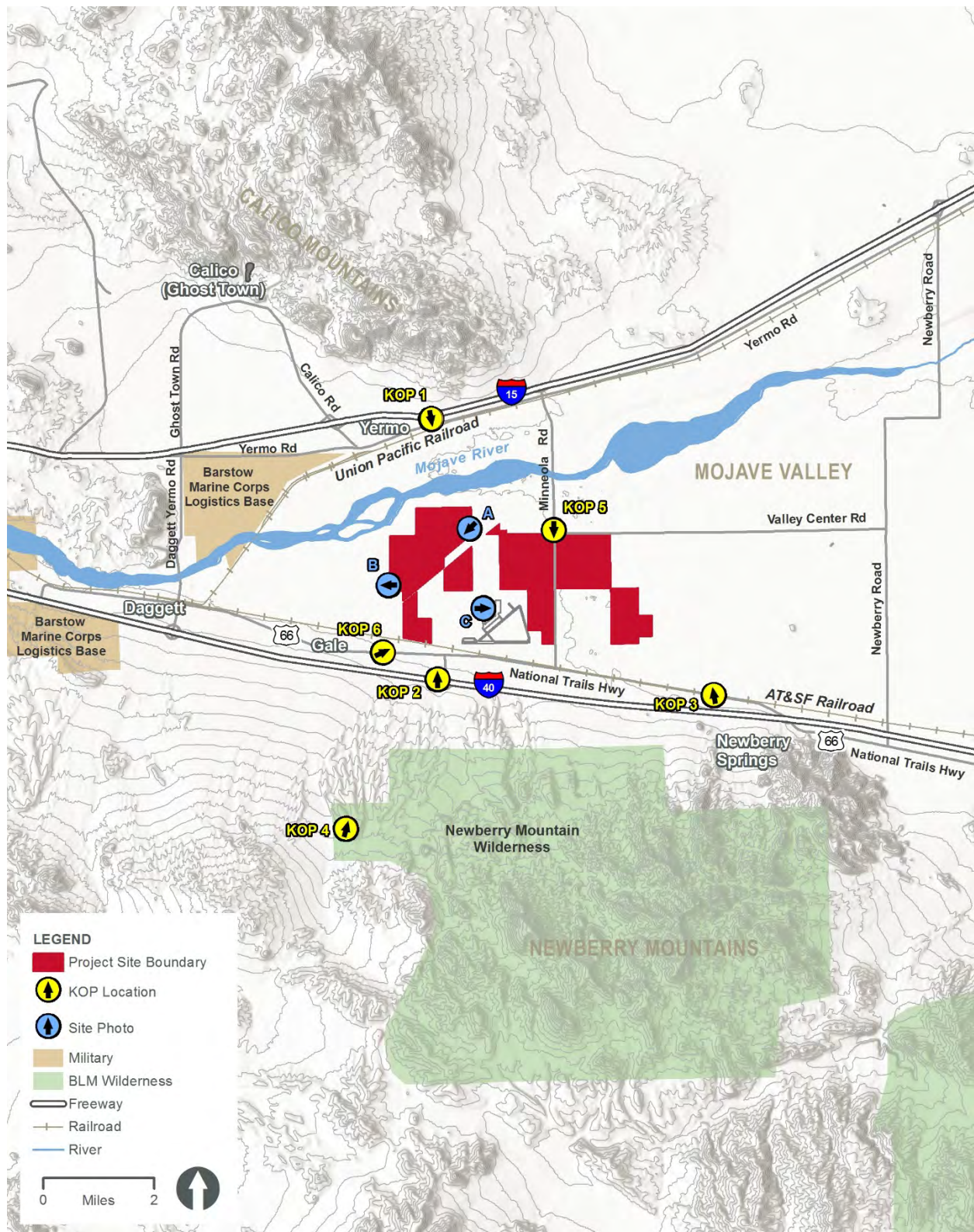
KOP 6 is located at the western extent of US 66 in the Mojave Valley, close to where the highway enters the valley near Daggett. This KOP faces east-northeast and is situated just south of the southwestern most solar field in the project site. Both existing and post-project simulation views from KOP 6 are depicted in Figure 2. In addition to eastbound travelers along US 66, there are a few residents just east of KOP 6 that would have a similar view of the project site. As shown in Figure 2, the solar arrays (and fencing) would be visible in the immediate foreground and middleground and would replace the view of an irrigated pasture. The new gen-tie structures and substation would be visible behind the solar array, in the middleground and just west of the Barstow-Daggett Airport. Solder Mountain would continue to be visible in the background. As a result, although the Project would add to the existing visual encroachments within the viewshed, the project solar arrays would be vertically shallow and the transmission towers and substation at distance such that the project would not substantially degrade the viewshed or limit the feeling of openness. Given the existing typical attractiveness, low to moderate scenic quality (Class III), and preexisting visual encroachments, no significant, adverse landscape change is identified for KOP 6.

The contrast rating worksheet used as part of this analysis is provided in Attachment A.

Findings

Based on the results of this assessment, the findings and conclusions of the VIA remain valid. No new, significant visual impacts were identified for KOP 6 with the addition of the project.

Figure 1. Key Observation Point 6





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Figure 2. Pre- and Post-Project Conditions at KOP6



BEFORE - Original Photo



AFTER - Photo Simulation



CONTEXT - Original Photo (above left) within Original Panoramic Context

Image Data
Camera Model: Canon EOS Rebel T6
Camera Height: 68 inches
Direction of View: East
Distance to Project: 520 meters

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Attachment A – BLM Contract Rating Sheet

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

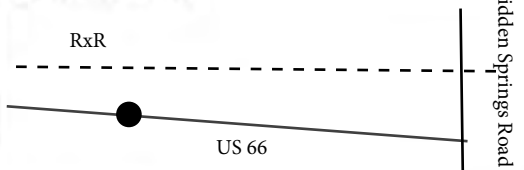
Date July 2, 2018

District Barstow

Resource Area

Activity (program) N/A

SECTION A. PROJECT INFORMATION

1. Project Name Daggett Solar Farm	4. Location Township 9 N Range 1 E Section 30 Minneola	5. Location Sketch 
2. Key Observation Point #6		
3. VRM Class Unclassified		

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat and regular	regular and contrasting	linear, vertical, irregular
LINE	butt edge	continuous	parallel and perpendicular
COLOR	light tans to dark brown and yellow	pale and dark green, darker brown	grey, red, and brown
TEXTURE	medium	continuous, random	coarse and scattered

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat and regular	regular and contrasting	linear, vertical, irregular
LINE	transitional edge	broken	parallel and perpendicular
COLOR	light tans to dark brown and yellow	pale green, darker brown	light and dark grey, brown, and red
TEXTURE	medium	discontinuous, random	coarse and clumped

SECTION D. CONTRAST RATING ☐ SHORT TERM ☒ LONG TERM

1. DEGREE OF CONTRAST		FEATURES												2. Does project design meet visual resource management objectives? <input type="checkbox"/> Yes <input type="checkbox"/> No N/A (Explain on reverse side)		
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)						
		Strong	Moderate	Weak	None	Strong	Moderate	Weak	None	Strong	Moderate	Weak	None			
ELEMENTS		Form		X				X				X				3. Additional mitigating measures recommended <input type="checkbox"/> Yes <input type="checkbox"/> No (Explain on reverse side)
		Line			X			X			X					
		Color			X			X			X					
		Texture		X				X			X					
Evaluator's Names Sarah Barrera Clint Meyer														Date July 2, 2018		